

EXHIBIT D

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

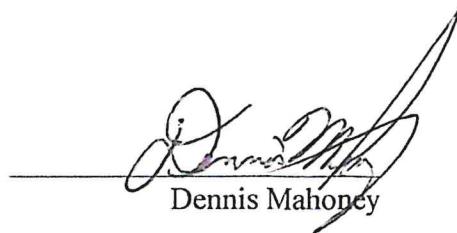
Michael McCarthy, et al.,)	
)	
Plaintiffs)	
)	
)	
v.)	Civil Action No.: 4:20-cv-10701-DPW
)	
)	
Charles D. Baker, in his Official Capacity as Governor of the Commonwealth of Massachusetts, et al.,)	
)	
Defendants)	
 Cedrone, LLC d/b/a Shawsheen Firearms, et al.,)	
)	
Plaintiffs)	
)	
)	
v.)	Civil Action No.: 4:20-cv-40041-DPW
)	
)	
Charles Duane Baker, in his Capacity as Governor of the Commonwealth of Massachusetts, et al.,)	
)	
Defendants)	

Affidavit of Dennis Mahoney

1. I am the President of the Ayer Gun & Sportsmen's Club
2. Ayer Gun & Sportsmen's Club, is a sportsmen's club located in Ayer, Massachusetts.
3. Neither myself nor the Ayer Gun & Sportsmen's Club are parties in the above named suits.
4. This affidavit is being provided to provide information for the Court.
5. Ayer Gun & Sportsmen's Club operates both indoor and outdoor shooting ranges.

6. The Ayer Gun & Sportsmen's Club is situated on approximately 99.9 acres of land.
7. The outdoor shooting facilities are built such that proper social distancing can occur while individuals are shooting.
8. The indoor shooting facilities are built such that proper social distancing can occur while individuals are shooting.
9. The indoor shooting facilities have a Hepa Filter system installed, and pictures of the system are included with this affidavit.
10. This system is designed to draw the heavy particles from discharging a firearm away from the shooter.
11. As such, particles as small as viruses would not have the opportunity to linger near a shooter.
12. The Ayer Gun & Sportsmen's Club is only accessible via one road to the Property. The Entrance Road to the Outdoor Range is secured by a gate. The Building and Indoor Ranges only Members in Good Standing have Electronic Key access cards to Enter.
13. Only members are permitted on the Ranges, greatly reducing the amount of people using the facilities. (Guests or Family Member may accompany a Member under their supervision and Must sign in). During Functions the Ranges are closed.
14. Should Ayer Gun & Sportsmen's Club be allowed to reopen, proper social distancing would occur.
15. Ayer Gun & Sportsmen's Club would adhere to all health, safety and social distancing guidelines should it be allowed to reopen.

Signed under the pains and penalties of perjury this 13th day of May, 2020.



Dennis Mahoney



Ayer Gun & Sportsmen's Club

255 Snake Hill Road

Ayer, MA 01432

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Website: www.ayergunclub.org

Email: ayergsc@gmail.com

ATTN: Attorney Andrew Couture

We are looking forward to being able to reopen our ranges. Attached are the diagrams of both the indoor and outdoor ranges as well of pictures of the new ventilation system.

The club was organized in the year 1909; it was incorporated in 1939. In 2014, we celebrated our 100th anniversary and currently own approximately 99.9 acres.

In 2019, we installed a new ventilation system with a Hepa filter for our Indoor range (Figures 3-6)

The outdoor range is shown in Figure 1. There are 4 booths 10-12 feet apart, with a 25' pistol target area and a 50', 60', and 75' for rifle. There is a locked gate and only members are allowed. The Indoor range has 2 areas 12' x 50' for a total of 1,200 square feet. There are 6 lanes—3 on each side; each lane is 4' wide (see Figure 2).

The plan is that we would allow 2 people at a time in either ranges scheduled by appointment only through the Range Captain.

Regards,
Dennis Mahoney
President, Ayer Gun & Sportsmen's Club

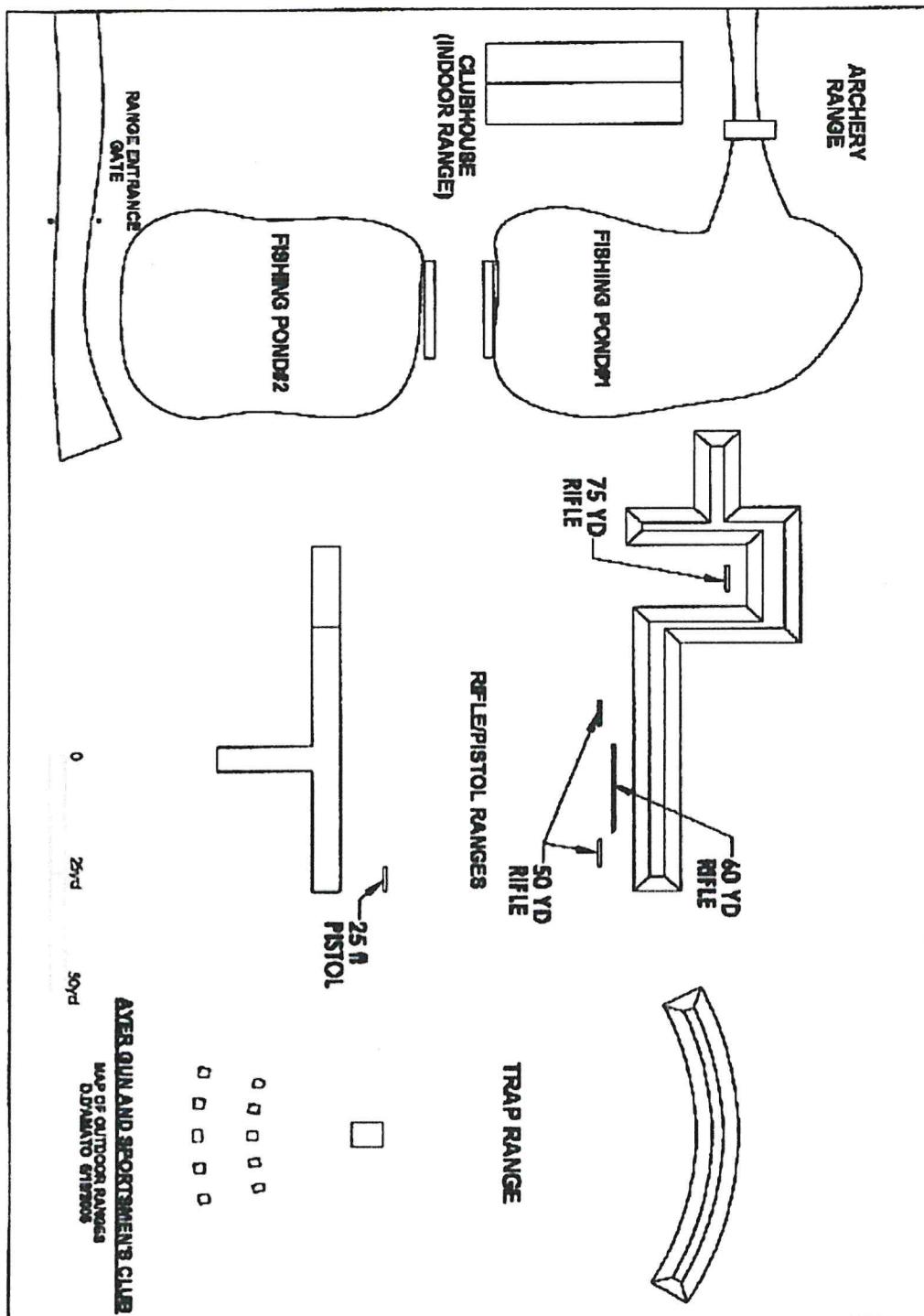


FIGURE 1

FIGURE 2

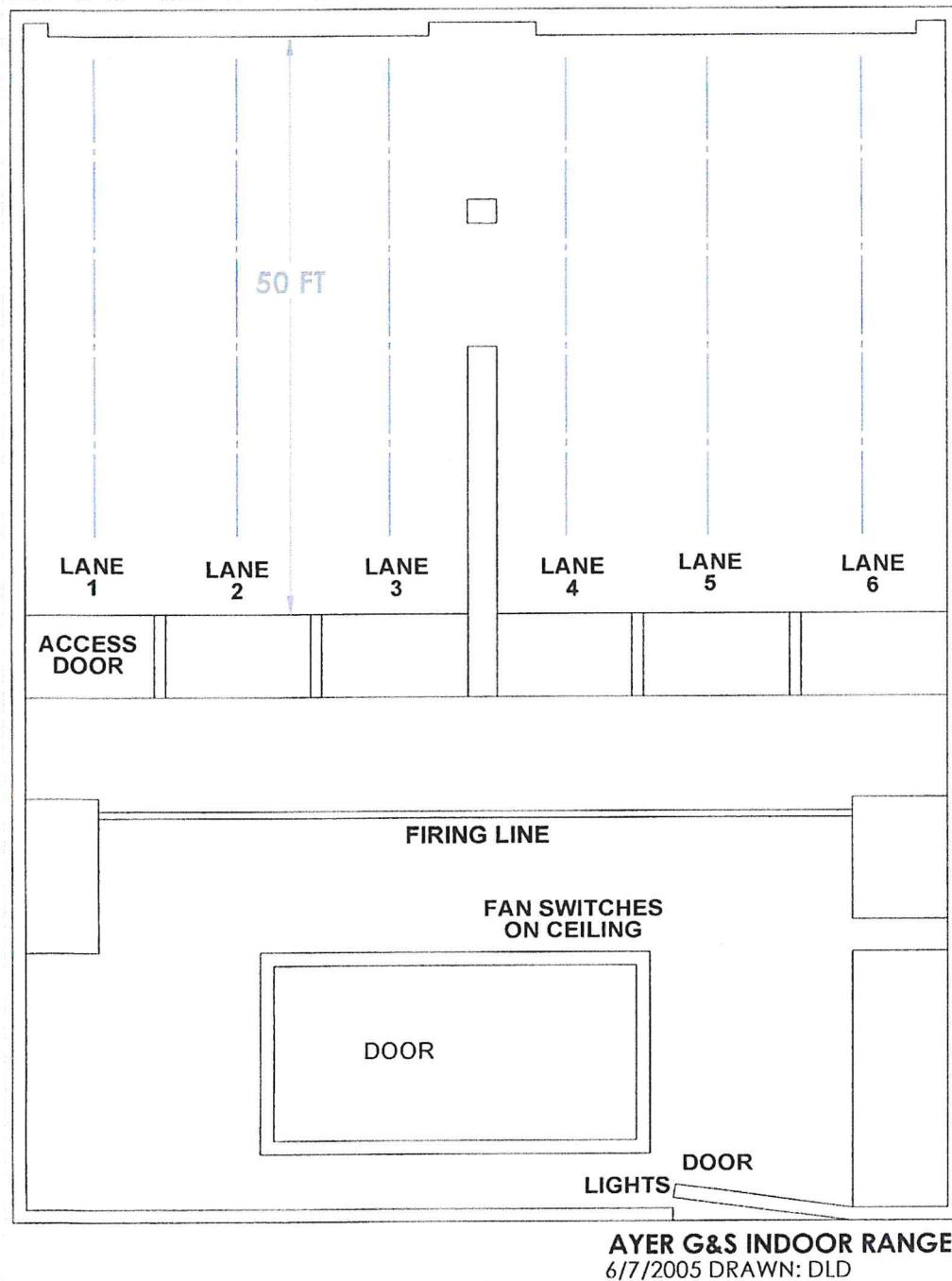


FIGURE 3



FIGURE 4

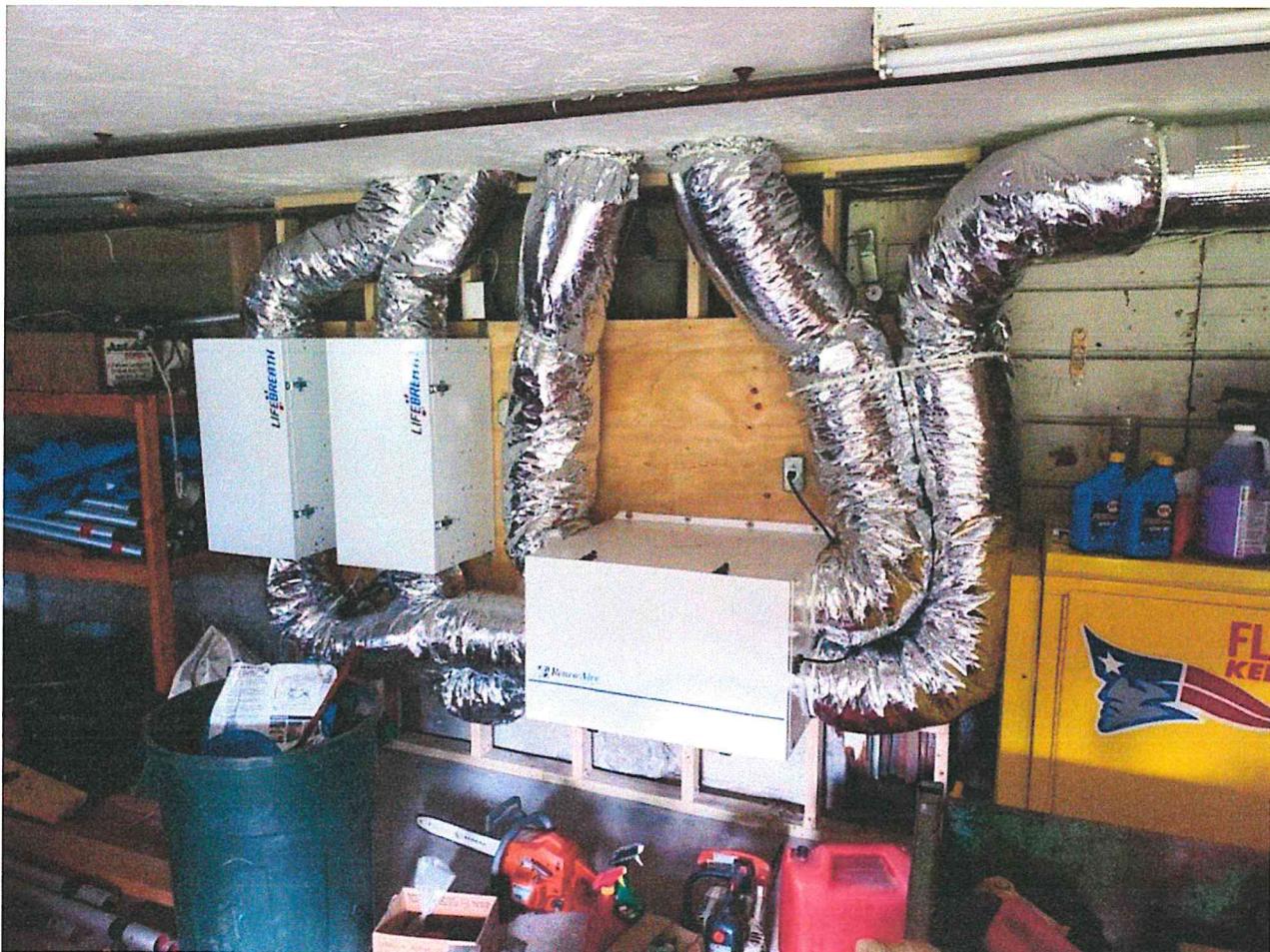


FIGURE 5



FIGURE 6

